

**REMARKS/ARGUMENTS**

Claims 1-23 were pending in this application. Claims 1, 10, and 18 have been amended. No claims have been added or canceled. Hence, claims 1-23 remain pending. Reconsideration of the subject application as amended is respectfully requested.

Claims 1-23 stand rejected under 35 U.S.C. § 102(e) as being anticipated by the cited portions of U.S. Patent No. 7,013,315 to Boothby, *et al.* (hereinafter "Boothby").

Claims 1, 10, and 18 have been amended in accordance with the Examiner's suggestions. No new matter has been added.

**Claim Rejections Under 35 U.S.C. § 102(e)**

The Applicants respectfully traverse the rejections of all claims rejected under 35 U.S.C. § 102(e) since the cited reference does not teach all the claim limitations, either expressly or inherently, as required for a proper rejection under 35 U.S.C. § 102(e). Specifically, for example, Boothby does not teach the limitations of claim 1.

Boothby appears to teach a method for synchronizing records in databases having dissimilar data values (Summary). In doing so, Boothby teaches creating a record group, referred to as a "Corresponding Item Group" (CIG), which "represent the same entry in each of the databases and the History File" (col. 8, ll. 44-47). A CIG may contain one, two, or three records (*id.*, ll. 47-48). The CIGs are then analyzed to determine what steps need to be taken to synchronize the databases. This is different than the Applicants' claim 1 for several reasons.

According to claim 1, a user designates a field as a key segment. A key segment field is common between two different files. This limitation is a departure from the teachings of Boothby since Boothby relates to comparing records having dissimilar data values.

Moreover, the office action likens Boothby's CIG to claim 1's "temporary electronic file." This is not accurate. Claim 1 recites "upon each occurrence of a match of data in the key segment of a record in the first file to data in the related key segment of a record in the second file, creating a record in a temporary electronic file, wherein the record in the temporary file includes at least one field and wherein the at least one field includes a copy of the matching data from the first and second files." This limitation distinguishes claim 1's temporary file from

Boothby's CIGs. Boothby's CIG contains multiple copies of information from each of three files, each of two databases and a history file. The Applicants, on the other hand, reproduce a single copy of matching date into the temporary file. Further, Boothby's CIGs are limited to three records, one for each of the two databases and the history file. In contrast, the Applicants' temporary file generates a record each time a match occurs between the two files being compared. Hence, the Applicants' temporary file is not limited to three records. Further still, Boothby's CIG records are not necessarily matches. Boothby copies data from a database or the history file in any of a number of circumstances, not "upon each occurrence of a match." This recalls the fundamental difference between the Applicant's claimed invention and the teachings of Boothby since Boothby operates on databases having dissimilar data values. As one skilled in the art will appreciate, matching dissimilar data values (e.g., integers and real numbers) creates complications not present in the Applicants' claimed invention relating to matching common key segments. Hence, for at least the foregoing reasons, claim 1 is believed to be allowable. Claims 2-9 depend from claim 1 and are believed to be allowable for at least the reasons stated above.

Claims 10 and 18 include limitations similar to those discussed above with respect to claim 1 and are believed to be allowable for similar reasons. The remaining claims depend from one of the independent claims and are believed to be allowable, at least for the reasons stated above.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

Dated: October 24, 2006

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